

SUMMARY OF COMMENTS FILED JUNE 1999
The Need for Rules Pertaining to the Provision of
Collocation Facilities

Docket UT-990582

Issue	Interested Persons	Comments Received	Staff Response
Collocation	GTE	<p>No rules are necessary at this time. The framework created by FCC 99-48 and GTE's interconnection agreements is sufficient to provide for collocation.</p> <p>Efforts should be focused on determining appropriate prices for collocation, perhaps as part of Docket UT-960369, -370, and -371.</p>	
Collocation	US WEST	<p>No rules are necessary at this time. Currently existing rules are sufficient to effectively administer collocation. Rules include: FCC 1st Report and Order, CC Docket 96-325, codified in § 51.323; WUTC Docket UT-960323, -326, -337 (collocation space evaluation criteria); WUTC Docket UT-960369, -370, -371 (interconnection, UNE, and resale cost and price docket); FCC 706 Collocation Rules, CC Docket 98-147; several interconnection agreements outlined in the template in Attachment A.</p> <p>Further, US West has already developed collocation policies in compliance with many of the new FCC rules. To date no CLEC has filed a formal complaint regarding collocation issues.</p>	
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Collocation	NEXTLINK, ELI, AT&T, TCG	The Commission should codify its prior decision in the <i>Collocation Order</i> regarding reservation of space, reclamation, cost allocations, and timetables.	

	Seattle, ATGI, GST, and MCI Worldcom	<p>The rules should provide for collocation consistent with the minimum requirements for ILECs outlined by the FCC in its <i>Advanced Services Order</i>. Pricing for collocation should be based on the TELRIC standard established in § 251(c)(6) and should be determined in a parallel rulemaking. The rules should limit the security measures that the ILEC can impose on collocating CLECs.</p> <p>The Commission need not adopt its own rules on spectral compatibility, but should enforce ILECs' duties as set forth in the FCC's <i>Advanced Service Order</i>.</p> <p>Beyond the minimum standards outlined by the FCC, the Commission should also adopt rules that: 1) Make adjacent collocation mandatory at all offices regardless of space exhaust; 2) allow collocators to self-provision all equipment and facilities within a collocation space; and 3) require ILECs to provide loop availability data.</p> <p>As in WAC 480-09-530, the Commission should establish short time frames for resolving collocation disputes and ILECs' provision of collocation space.</p> <p>Rules should ensure that ILECs provide collocation on a nondiscriminatory basis.</p>	
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Collocation	Sprint	Rules should be established to foster the development of local competition. The Commission should consider a proceeding before the California Public Utilities Commission in Docket R.95-04-043, I.95-04-044 (Attachment 1). Also attached are comments regarding collocation in California and the FCC collocation rules.	

Collocation	ACI Corp.	<p>The proposed collocation rules ACI submitted in the Petition for Rulemaking and Draft Rules should serve as the starting point for the Commission's analysis of collocation issues (included in Exhibit 1).</p> <p>The proposed rules would require:</p> <ul style="list-style-type: none"> • ILECs to make physical collocation available • ILECs to provide the burden of the proof that space on the premises has been exhausted, and establish procedural requirements for such proof • ILECs to provide alternative forms of collocation where space has been exhausted • ILECs to provide collocation at reasonable intervals and prices. 	
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Collocation	Covad Comm. Co.	<p>The Commission should adopt the proposed rules drafted by ACI Corp. and submitted to the Commission in Docket UT-990469.</p> <p>The Commission should also adopt a rule that uses the FCC's broad definition of "premises" to clarify where CLECs may collocate.</p> <p>Finally, the rules should reinforce FCC 99-48 which requires incumbents to collocate ATM equipment and any advanced telecommunications services.</p>	
Collocation	Weather-spoon Telephone LLC	<p>A CLEC should not be required to collocate in an ILEC's central office when the CLEC only requests local loop ports or ports in general.</p> <p>An ILEC should be required to sell local loop ports at any central office or point of access to a CLEC without unnecessary engineering fees.</p>	

